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	Attorneys for Defendant Apple Inc.		
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19	LINITED STAT	TES DISTRICT COURT	
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20	NORTHERN DIS	TRICT OF CALIFORNIA	
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22	AliveCor, Inc.,	CASE NO. 4:21-CV-03958-JSW-SK	
	Anvecor, me.,		
23	Plaintiff,	DEFENDANT APPLE INC.'S	
		ADMINISTRATIVE MOTION TO FILE	
24	V.	UNDER SEAL DECLARATION OF	
25	Apple Inc.,	JASON C. LO	
23	Apple nic.,		
26	Defendant.	The Honorable Jeffrey S. White	
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Pursuant to Civil Local Rule 7-11, 79-5, and the Court's order on the parties' stipulation regarding sealing of summary judgment filings (Dkt. No. 174), Defendant Apple Inc. ("Apple") respectfully submits this interim motion to seal and to consider whether another party's material should be sealed.

Apple moves to provisionally file under seal the Declaration of Jason C. Lo and related materials. The parties stipulated to a modified sealing procedure in connection with summary judgment briefing and any related filings. Dkt. 174 ("Stipulation Regarding Summary Judgment Briefing and Sealing and Expert Discovery Deadline"). The Court granted the stipulation on April 28, 2023, in an Order that states the parties may "file their summary judgment briefs and associated exhibits and supporting materials under seal initially, and file a consolidated set of sealing materials—including redacted briefs, exhibits, and supporting documents—after summary judgment briefing is complete." *Id.* at 3. Pursuant to that stipulation, Apple submits its "summary judgment brief[] and associated exhibits and supporting materials under seal" and will submit its consolidated set of sealing materials once summary judgment briefing is complete. *Id.* The reasons for sealing will be discussed in a forthcoming sealing motion as part of that consolidated set of sealing materials.

In particular, Apple seeks to provisionally seal the following materials:

<u>Document</u>	Portion to Be Filed Under Seal	<u>Designating Party</u>
Declaration of Jason C. Lo	Entire document	Apple and/or AliveCor
Exhibit 1 to the Declaration of Jason C.	Entire document	Apple and/or AliveCor
Exhibit 2 to the Declaration of Jason C. Lo	Entire document	Apple and/or AliveCor
Exhibit 3 to the Declaration of Jason C.	Entire document	Apple and/or AliveCor
Exhibit 4 to the Declaration of Jason C. Lo	Entire document	Apple and/or AliveCor
Exhibit 5 to the Declaration of Jason C.	Entire document	Apple and/or AliveCor
Exhibit 6 to the Declaration of Jason C.	Entire document	Apple and/or AliveCor
Exhibit 7 to the Declaration of Jason C. Lo	Entire document	Apple and/or AliveCor
Exhibit 8 to the Declaration of Jason C. Lo	Entire document	Apple and/or AliveCor
Exhibit 9 to the Declaration of Jason C. Lo	Entire document	Apple and/or AliveCor

1	Exhibit 10 to the Declaration of Jason C.	Entire
2	Exhibit 11 to the Declaration of Jason C.	Entire
3	Exhibit 12 to the Declaration of Jason C.	Entire
4	Exhibit 13 to the Declaration of Jason C.	Entire
5	Exhibit 14 to the Declaration of Jason C.	Entire
6	Exhibit 15 to the Declaration of Jason C.	Entire
7	Lo Exhibit 16 to the Declaration of Jason C.	Entire
8	Lo Exhibit 17 to the Declaration of Jason C.	Entire
9	Lo Exhibit 18 to the Declaration of Jason C.	Entire
10	Lo Exhibit 19 to the Declaration of Jason C.	Entire
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12	Exhibit 20 to the Declaration of Jason C. Lo	Entire
13	Exhibit 21 to the Declaration of Jason C. Lo	Entire
	Exhibit 22 to the Declaration of Jason C. Lo	Entire
14	Exhibit 23 to the Declaration of Jason C. Lo	Entire
15	Exhibit 24 to the Declaration of Jason C.	Entire
16	Exhibit 25 to the Declaration of Jason C. Lo	Entire
17	Exhibit 26 to the Declaration of Jason C.	Entire
18	Exhibit 27 to the Declaration of Jason C.	Entire
19	Exhibit 28 to the Declaration of Jason C.	Entire
20	Exhibit 29 to the Declaration of Jason C.	Entire
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25	Exhibit 33 to the Declaration of Jason C.	Entire
26	Exhibit 34 to the Declaration of Jason C. Lo	Entire
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Exhibit 65 to the Declaration of Jason C.	Entire document	Apple and/or AliveCor
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Apple seeks to seal information designated confidential or highly confidential by Apple and by AliveCor. Apple takes no position on the merits of the confidentiality designations by AliveCor.

For the foregoing reasons, Apple respectfully requests that the Court grant Apple's Administrative Motion to Seal.

DATED: July 27, 2023 GIBSON, DUNN & CRUTCHER LLP

By: /s/ Jason C. Lo Jason C. Lo

Attorney for Defendant Apple Inc.

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